

Papi under state law; Count V Monell claims against Overfield Township, Tunkhannock Township, Meshoppen Borough, and Tunkhannock Borough under Section 1983; Count VI– claims for failure to supervise against Chief Fisher, Paul Miller, Chief Ely, Chief Kreig, and Chief Olszewski; Count VII (misabeled Count VI)– claims under the Rehabilitation Act and Americans with Disabilities Act against Overfield Township, Tunkhannock Township, Meshoppen Borough, and Tunkhannock Borough.

2. Based upon the evidence developed in discovery and attached to the Concise Statement of Facts in support of this Motion for Summary Judgment and Plaintiff's lack of evidence supporting essential elements of claims against Defendants, Defendants are entitled to the entry of judgment in their favor and against Plaintiff.

3. Defendants are separately filing a Concise Statement of Material Facts in support of the Motion for Summary Judgment, which details the uncontested material facts which entitle Defendants to judgment as a matter of law and which include an Appendix of Exhibits which contains the evidence in support of the Statement of Facts and this Motion for Summary Judgment.

4. Defendants are separately filing a Brief in Support of the Motion for Summary Judgment, which specifies the reasons that judgment should be entered in the favor of each and every Defendant and against Plaintiff on each count of the Amended Complaint.

WHEREFORE, in accord with the evidence of record, the statement of facts, this Motion for Summary Judgment, and the Brief in Support of the Motion for Summary

Judgment, Defendants respectfully request that this Honorable Court grant summary judgment and enter judgment in their favor and against Plaintiff on all counts of the Amended Complaint.

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